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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
EUGENE DIVISION**

Elizabeth HUNTER; et al.,)	
)	
Plaintiffs,)	Case No. 6:21-cv-00474-AA
v.)	
U.S. DEPARTMENT OF EDUCATION; and)	UNOPPOSED JOINT MOTION
Catherine LHAMON, in her official capacity as)	FOR EXTENSION OF TIME
Assistant Secretary for the Office of Civil)	FOR RESPONSES AND
Rights, U.S. Department of Education,)	REPLIES REGARDING
Defendants,)	PLAINTIFFS' MOTION FOR
)	LEAVE TO FILE SECOND
v.)	AMENDED COMPLAINT
COUNCIL FOR CHRISTIAN COLLEGES &)	
UNIVERSITIES, WESTERN BAPTIST)	
COLLEGE d/b/a CORBAN UNIVERSITY,)	
WILLIAM JESSUP UNIVERSITY AND)	
PHOENIX SEMINARY,)	
Intervenor-Defendants)	
)	
)	

The parties respectfully request an extension for Defendants and Defendant-Intervenors to respond to Plaintiffs' Motion for Leave to File Second Amended Complaint ("Motion to Amend"), Dkt. 148, to January 7, 2022, and for Plaintiffs to reply in support of their Motion to Amend to January 21, 2022, and, in support thereof, state as follows:

1. Plaintiffs filed their Motion to Amend on December 2, 2021.
2. Defendant and Defendant-Intervenors deadline to respond to Plaintiffs' Motion to Amend is currently December 16, 2021.
3. Plaintiffs deadline to reply in support of their Motion to Amend is currently December 30, 2021.
4. In light of the upcoming holidays, and other briefing deadlines in this matter, the parties request additional time to brief the Motion to Amend.

Wherefore, the parties respectfully request an extension to January 7, 2022 for responses to Plaintiffs' Motion to Amend and to January 21, 2022 for Plaintiffs' reply in support of their motion to amend.

Date: December 9, 2021

s/ Paul Carlos Southwick

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